

### **REMARKS**

The Office Action mailed July 12, 2005 has been received and the Examiner's comments carefully reviewed. Claims 52-56 and 58-65 have been allowed. Applicants thank the Examiner for this notification. Claims 1-28, 30-40, 42-47 and 49-69 are currently pending. Applicants respectfully submit that the pending claims are in condition for allowance.

### **Finality of the Rejection**

Applicants respectfully submit that a final rejection is premature and request withdrawal of the finality. In particular, Applicants presented new claim 69 in the last reply of August 2004. Before a final rejection is in order, the Examiner must clearly state the reasons in support thereof. 37 CFR §1.113. The status of claim 69 have not been provided. Because a clear issue has not been developed between the Examiner and Applicants, at least with regards to claim 69, Applicants respectfully request withdrawal of the finality. MPEP 706.07.

Further, Applicants presented new claim 57 in the last reply of August 2004. New claim 57 corresponds to objected-to claim 12, only re-written in independent form. Applicants respectfully note that any subsequent action on the merits of an application cannot be made final if it includes a new grounds for rejection neither necessitated by Applicants' amendment nor based on information submitted in an Information Disclosure Statement. The Examiner raised new grounds for rejecting claim 57 (objected-to claim 12 re-written in independent form). Applicants submit that re-writing claim 12 in independent form does not properly fall within an amendment that necessitates finality of a rejection.

Applicants respectfully submit that a final rejection is premature and request withdrawal of the finality.

### **Rejections Under 35 U.S.C. §102**

The Examiner rejected claim 51 under 35 U.S.C. §102(e) as being anticipated by Guenther et al. (U.S. Patent 6,438,226 B1). Applicants respectfully traverse this rejection.

(i) Claim 1 recites a telecommunications component including a POTS splitter card mounted in a chassis, and a plurality of interface cards. The POTS splitter card is electrically connected to a card edge connector of the interface card.

The Examiner states that Guenther discloses a plurality of "interface" cards 40. The Examiner also states that Guenther discloses a POTS splitter card (i.e. a splitter circuit 78). Applicants respectfully note, however, that the POTS splitter card to which the Examiner refers is the same card 40 that the Examiner characterized as the interface card. In particular, Guenther discloses that, for example, lines 70 and 72 "may be routed directly to POTS contacts 80 and xDSL contacts 82, respectively, of splitter circuit 78 on card 40." Column 8, lines 32-36. Splitter circuitry provided on a card does not meet the two structural requirements of an interface card and a POTS splitter card to establish a proper basis for an anticipation rejection. Guenther simply does not disclose both an interface card and a POTS splitter card.

(ii) Claim 1 also recites that the interface cards of the telecommunications component includes first, second and third connectors mounted adjacent a first end of a circuit board, and card edge connectors mounted adjacent a second opposite end of the circuit board. The card edge connectors include contacts electrically connected to the cable connectors by the circuit board.

In reply to Applicants' previous amendment, the Examiner states that Guenther discloses both cable (three each) and card edge connectors mounted on opposite ends (i.e. front end and back end) of a circuit board (i.e. splitter circuit on a card) [FIGS. 7-8].

It is unclear to Applicants which specific connections of Guenther the Examiner is characterizing and the three cable connectors, and which specific connections of Guenther the Examiner is characterizing as card edge connectors. It appears from the reference numbers noted on page 4 of the Action, that the Examiner is characterizing lines 70, 72, and 74 as cable connectors and contacts 80, 82, and 84 as card edge connectors. If this assumption is incorrect, Applicants request immediate notification and a rightful opportunity to respond to the Examiner's clarified rejection.

(a) Assuming Applicants' interpretation of the Examiner's rejection is correct, nowhere does Guenther disclose that all three lines 70, 72, 74 can be directly mounted to the card 40. In fact, FIGS. 10-12 of Guenther illustrate the contemplated alternative wiring embodiments, and nowhere is line 74 shown to be wired directly to the card 40.

(b) Also, lines 70, 72, and 74 are not "connectors" for inputting and outputting twisted pairs signals. Lines 70, 72, and 74 are in fact the "lines" that carry the twisted pair signal and that connect to "connectors". Nonetheless, the Examiner states that the lines can be mounted to a circuit board. Guenther discloses that the two lines 70 and 72 can be mounted to contacts 80, 82.

However, mounting lines 70 and 72 at contacts 80 and 82 does not meet the structural requirements of cable connectors mounted adjacent a first end of the circuit board, and card edge connectors mounted adjacent an opposite second end of the circuit board. Instead, the lines and contacts are mounted at the same location because the lines and contact are in fact connected to one another.

(c) Furthermore, the contacts 80, 82 are not electrically connected to the lines 70, 72 "by the circuit board", as required by claim 51. Instead, the contacts and lines are electrically connected by the direct physical connection established between the two, independent of the card 40, not because of or by the card.

At least for these reasons, Applicants respectfully submit that Guenther does not meet all the structural limitations of claim 51 to establish a proper basis for an anticipation rejection. Applicants therefore respectfully submit that independent claim 51 is patentable.

### **Rejections Under 35 U.S.C. §103**

The Examiner rejected claims 1-3, 9-11, 13-14, 15-17, 19-22, 28, 31-37, 39, 42-44, 46, 49-50, 57, and 66-68 under 35 U.S.C. §103(a) as being unpatentable over Guenther et al. (U.S. Patent 6,438,226 B1) in view of Lemke (U.S. Patent 4,824,383). Applicants respectfully traverse this rejection.

#### **A. Claims 1-3, 9-11, 13-17, 19-22**

Claims 1 and 15 recite a telecommunications component including a circuit board with first, second, and third multi-pair cable connectors mounted on the circuit board. First, second, and third tracings are provided on the circuit board for connecting the multi-pair cable connectors to contacts of a card edge connector, which is also connected to the circuit board.

(i) Again assuming Applicants' above interpretation of the Examiner's rejection is correct, nowhere does Guenther disclose that three lines 70, 72, 74 can be directly mounted to the card 40. As previously discussed, FIGS. 10-12 of Guenther illustrate the contemplated alternative wiring embodiments, and nowhere is line 74 shown to be wired directly to the card 40. Lemke does not make of for the deficiencies of Guenther.

(ii) In addition, the contacts 80, 82 of Guenther are not connected to the lines 70, 72 by tracings provided on the circuit board, as required by claims 1 and 15. Instead, the contacts and

lines are connected by the direct physical connection established between the two, independent of any tracings provided on the card 40. Lemke only teaches tracings 88 provided on a printed circuit board 86. Lemke does not teach that the lines 70, 72, and 74 of Guenther can be connected to "connectors" and that those "connectors" can be interconnected to contacts of card edge connectors by tracings, as required by claims 1 and 15.

To establish a prima facie case of obviousness, the prior art references must teach or suggest all the claim limitations. At least for the above reasons, Applicants respectfully submit that the basic criterion for obviousness is not met. Applicants therefore respectfully submit that independent claims 1 and 15, and dependent claims 2-3, 9-11, 13-14, 16-17, and 19-22 are patentable.

B. Claim 28

Claim 28 recites a splitter card having first and second card extensions adapted to be received in a card edge connector. The first card extension includes first and second contacts and the second card extension includes third contacts. All of the first and second contacts are located at the first extension, and all of the third contacts are located at the second extension, wherein the first and second contacts are grouped together at a location separate from the third contact.

(i) The Examiner has not provided further comment to Applicants previous reply of August 27, 2004. Applicants previously noted that Guenther does not in fact teach or suggest first and second card extensions wherein the first and second contacts are located on the first extension and the third contacts are located on the second extension. That is, Guenther does not teach that all of first and second contacts are grouped together at a location separate from the third contacts. In contrast, the contacts 80, 82, 85 are all grouped together on the card 40, and are not separated, as recited in claim 28. Where Guenther fails to teach or suggest contacts grouped separately on first and second extensions, Lemke fails to make up for Guenther's deficiencies. Applicants respectfully request further comment from the Examiner as to how this rejection can be maintained in light of these distinctions.

(ii) In addition, Applicants respectfully note that claim 28 requires a first card extension adapted to be received in a card edge connector. Guenther does not teach or suggest that the contacts 80, 82, 84 can be received in a card edge connector.

(iii) Further, claim 28 requires that the first card extension include first contacts for receiving mixed voice and data signals and second contacts for outputting first signals. The Examiner states that Guenther teaches that all the first contacts (i.e. POTS contacts 84) and the second contacts (i.e. xDSL contacts 82) are located at a pair of terminals. A pair of terminals, however, does not meet the structural limitations of a first card extension. Lemke does not make up for the deficiency of Guenther.

To establish a prima facie case of obviousness, the prior art references must teach or suggest all the claim limitations. At least for the above reasons, Applicants respectfully submit that the basic criterion for obviousness is not met. Applicants therefore respectfully submit that claim 28 is patentable.

C. Claims 31-32, and 66

Claim 31 recites a telecommunications component having a circuit board, three multi-pair connectors, first and second card edge connectors, and three conductive pathways provided on the circuit board for connecting contacts of the card edge connectors with the multi-pair connectors.

(i) The contacts 80, 82 of Guenther are not connected to lines 70, 72 by pathways provided on the circuit board, as required by claim 31. Instead, the contacts and lines are connected by the direct physical connection established between the two, independent of any pathways provided on the card 40. Lemke only teaches tracings 88 provided on a printed circuit board 86. Lemke does not teach that the lines 70, 72, and 74 of Guenther can be connected to "connectors" and that those "connectors" can be interconnected to contacts of card edge connectors by pathways, as required by claim 31.

At least for this reason, Applicants respectfully submit that independent claim 31, and dependent claims 32 and 66 are patentable.

D. Claims 33-34 and 67

Claim 33 recites a telecommunications chassis assembly having a first row of card edge connectors with exclusively normally closed contacts, and a second row of card edge connectors having exclusively normally open contacts.

(i) The Examiner stated that ". . . a first card edge connector and a separate second card edge connector, the first card edge connector including the normal closed contacts and the second card connector including the normally open contacts" is a uniquely distinct feature of the claimed splitter architecture. Claim 33 recites first card edge connectors having exclusively normally closed contacts and second card edge connectors having exclusively normally open contacts. At least for the reason previously identified by the Examiner, Applicants respectfully submit that claim 33, and dependent claims 34 and 67 are patentable.

E. Claims 35-36 and 68

Claim 35 recites a telecommunications chassis assembly a plurality of multi-pair connectors. The assembly also has a first array of card edge connectors and a second array of card edge connectors. The multi-pair connectors are electrically connected by circuit boards exclusively to particular arrays of the card edge connectors.

(i) The lines 70, 72 of Guenther are not electrically connected to the contacts 80, 82 by the circuit board, as required by claim 35. Instead, the contacts and lines are connected by the direct physical connection established between the two, independent of the card 40, not because of or by the card. Lemke only teaches tracings 88 provided on a printed circuit board 86. Lemke does not teach that the lines 70, 72, and 74 of Guenther can be connected to "connectors" and that those "connectors" can be interconnected to contacts of card edge connectors by the circuit board, as required by claim 35.

At least for this reason, Applicants respectfully submit that independent claim 35, and dependent claims 36 and 68 are patentable.

F. Claims 37, 39, 42-44, 46, and 49-50

Claims 37 and 44 recite a telecommunications component including an interface card. The interface card has first, second, and third cable connectors mounted to the circuit board, and a card edge connector connected to the circuit board. The card edge connector includes contacts electrically connected to the cable connectors by the circuit board. The component also includes a POTS splitter card electrically connected to the card edge connector of the interface card.

(i) Again assuming that the Examiner is characterizing the lines 70, 72, and 74 as cable connectors and the contacts 80, 82, and 84 as card edge connectors, nowhere does Guenther disclose

that all three lines 70, 72, and 74 can be directly mounted to the card 40. FIGS. 10-12 of Guenther illustrate the contemplated alternative wiring embodiments, and nowhere is line 74 shown to be wired directly to the card 40.

(ii) In addition, the contacts 80, 82 are not electrically connected to the lines 70, 72 "by the circuit board", as required by claims 37 and 44. Instead, the contacts and lines are electrically connected by the direct physical connection established between the two, independent of the card 40, not because of or by the card.

(iii) Furthermore, the POTS splitter card to which the Examiner refers is the same card 40 that the Examiner characterized as the interface card. Splitter circuitry provided on a card does not meet the two structural requirements of an interface card and a POTS splitter card.

Lemke does not make up for the any of the above deficiencies of Guenther. To establish a prima facie case of obviousness, the prior art references must teach or suggest all the claim limitations. At least for the above reasons, Applicants respectfully submit that the basic criterion for obviousness is not met. Applicants therefore respectfully submit that independent claims 37 and 44, and dependent claims 39, 42-43, 46, and 49-50 are patentable.

#### G. Claim 57

Claim 57 recites the subject matter of objected-to claim 12, intervening claims 9-11, and originally filed base claim 1. The Examiner has now rejected claim 57.

Claim 57 recites a splitter card adapted for connection to one or more card edge connectors of a circuit board, the splitter card including at least 24 POTS splitters for splitting the mixed data/voice signals into the data signals and the voice signals. The Examiner stated that this recited splitter architecture is a uniquely distinct feature of the claimed splitter architecture. Office Action, page 13. At least for the reason previously identified by the Examiner, Applicants respectfully submit that claim 57 is patentable.

#### **Allowable Subject Matter**

Claims 52-56 and 58-65 are allowable. Applicants thank the Examiner for this notification.

The Examiner objected to claims 4-8, 12, 18, 23-27, 30, 38, 40, 45, 47, but indicated that claims 4-8, 12, 18, 23-27, 30, 38, 40, 45, 47 would be allowable if rewritten in independent form

incorporating all the limitations of the base claim and any intervening claims. Applicants thank the Examiner for this notification.

### SUMMARY

It is respectfully submitted that each of the presently pending claims (claims 1-28, 30-40, 42-47 and 49-69) is in condition for allowance and notification to that effect is requested. The Examiner is invited to contact Applicants' representative at the below-listed telephone number if it is believed that prosecution of this application may be assisted thereby.

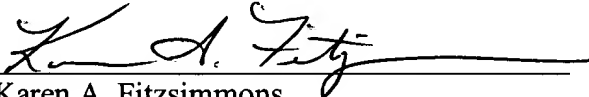
Although certain arguments regarding patentability are set forth herein, there may be other arguments and reasons why the claimed invention is patentably distinct. Applicants reserve the right to raise these arguments in the future.

Respectfully submitted,



MERCHANT & GOULD P.C.  
P.O. Box 2903  
Minneapolis, Minnesota 55402-0903  
(612) 332-5300

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Karen A. Fitzsimmons  
Reg. No. 50,470  
KAF:cjm